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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<p>NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, and NOVARTIS AG,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>WOCKHARDT USA LLC and WOCKHARDT LIMITED</p> <p style="text-align: center;">and</p> <p>SUN PHARMA GLOBAL FZE and SUN PHARMACEUTICAL INDUSTRIES LIMITED,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No.</p> <p>2:12-cv-03967-SDW-MCA</p> <p>[Consolidated with Civil Action Nos. 2:12-cv-04393, 2:13-cv-01028, 2:13-cv-02379, and 2:13-04669]</p>
<p>NOVARTIS PHARMACEUTICALS CORPORATION,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ACCORD HEALTHCARE INC.; ACTAVIS LLC; APOTEX, INC.; APOTEX, CORP.; GLAND PHARMA LTD.; DR. REDDY'S LABORATORIES, INC.; DR. REDDY'S LABORATORIES LTD.; EMCURE PHARMACEUTICALS USA, INC.; EMCURE PHARMACEUTICALS, LTD; FRESENIUS KABI USA, LLC; HIKMA FARMACEUTICA S.A.; HOSPIRA, INC.; PHARMACEUTICS INTERNATIONAL INC.; SAGENT PHARMACEUTICALS, INC.; ACS DOBFAR INFO S.A.; STRIDES, INC.; AGILA SPECIALTIES PRIVATE LTD.; SUN PHARMA GLOBAL FZE; CARACO PHARMACEUTICAL LABORATORIES, LTD.; SUN PHARMACEUTICAL INDUSTRIES LTD.; USV NORTH AMERICA, INC.; WOCKHARDT USA LLC; and WOCKHARDT LTD.,</p> <p style="text-align: center;">Defendants.</p>	

**DECLARATION OF SEAN K. THOMPSON  
IN SUPPORT OF NOVARTIS'S MOTION TO SEAL**

I, Sean K. Thompson, declare as follows:

1. I am a counsel at Wilmer, Cutler, Pickering, Hale and Dorr, 60 State Street, Boston, Massachusetts 02109, and counsel for Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) in the above-captioned matter. I submit this certification in support of Novartis’s Motion to Seal.

2. Novartis is requesting entry of an Order, pursuant to Local Civil Rule 5.3(c), to seal the following documents [D.I. 181]:

- 1) Portions of Novartis’s Response to Certain Defendants’ Requests to Supplement Their Motions to Dismiss with an FDA Letter;
- 2) Portions of the Declaration of Robert W. Trenchard; and
- 3) Exhibits 3–4 to the Declaration of Robert W. Trenchard.

(collectively, the “Subject Material”).

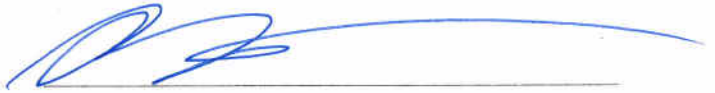
3. The aforementioned documents include information relating to Defendants Dr. Reddy’s Laboratory; Pharmaceutics International, Inc.; Sagent Pharmaceuticals, Inc.; ACS Dobfar Info S.A.; Emcure Pharmaceuticals USA, Inc.; and Emcure Pharmaceuticals, Ltd. (“Defendants”) ANDA product and/or proprietary business information that Defendants have designated as confidential and/or nonpublic. By making such a designation, Defendants have manifested their belief that the public disclosure of this information could adversely affect their legitimate business interests. Without conceding that the information found in the Subject Material warrants such a designation, Plaintiff attempts to honor this designation by filing the Subject Material under seal pursuant to Local Rule 5.3.

4. If this submission is not sealed, it is my understanding defendants would suffer harm.

5. There is no less restrictive alternative other than the sealing of this information. This is the least restrictive alternative available to protect information that is confidential and/or pursuant to Fed. R. Civ. P. 26(c).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: October 4, 2013



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Sean K. Thompson